



RESPONSE TO COMMENT

Received on the
CLOSURE APPLICATION AND DRAFT PERMIT
for the

SANPETE SANITARY LANDFILL COOPERATIVE CHESTER CLASS II LANDFILL

A 30-day public comment period on the closure permit application and draft permit for the Chester Class II Landfill owned by the Sanpete Sanitary Landfill Cooperative (Cooperative) ended August 5, 2005. During the public comment period, one letter was received. The Division of Solid and Hazardous Waste's (Division) response to the letter is provided below.

The reader should bear in mind that the responses to each comment are based on the Division's responsibility to implement the requirements contained in the *Utah Solid Waste Permitting and Management Rules* (Rules) and the *Utah Solid and Hazardous Waste Act* (Act).

Overview

An overview of the landfill operations at Chester will aid in addressing the concerns contained in the referenced letter. In 1989, the Cooperative opened a Class II landfill near Chester, Utah to accept nonhazardous municipal solid waste (household garbage) generated within Sanpete County. As allowed by state solid waste rules, the landfill disposal cell was an unlined earthen trench. Because of the limited environmental protection provided by an unlined disposal cell, the Rules restrict Class II landfills to receive 20 tons of waste per day or less. Landfills that receive more than 20 tons per day are typically required to have bottom liners systems and ground water monitoring. A liner system and groundwater monitoring would be required if the Chester landfill was to receive more than 20 tons per day of municipal waste.

After two years of operation, the records indicated that the Chester landfill was or would soon be exceeding the 20 tons per day limit. The Cooperative made a decision to search for another landfill site that could receive more than 20 tons per day as well as successfully demonstrate that a liner system and ground water monitoring would not be required. As a result of the search, a suitable site was selected and a Class I landfill was constructed and opened in 2001 at White Hills, west of Mayfield, Utah. The geologic conditions at White Hills allowed the landfill to receive more than 20 tons per day of garbage without the incorporation of a liner system or groundwater monitoring.

Once the White Hills landfill was open, the Cooperative decided to stop accepting municipal solid waste (household garbage) at the Chester site. Alternatively, the site would therefore cease operations as a Class II landfill and subsequently be operated as a Class IV (construction/demolition) landfill, which does not require liners or groundwater monitoring. Since 2002, the Chester site has accepted only construction/demolition waste, green waste, dead animals, and waste tires. It is the Division's understanding that the Class IV Chester landfill operation will continue to operate as currently managed.

The application and draft permit released for public comment in July 2005 was for the management of the closed municipal solid waste disposal cell at the Chester site and addressed the final closer cover design to be installed later in 2005.

WRITTEN COMMENTS

Citizen Letter

One letter (tracking # 05.02620) was received on August 1, 2005 regarding the closure permit application and draft permit. Following are excerpts from the letter.

We do not believe it poses any threat whatsoever to ground water supplies, or any other threat to the environment.

Further, the closure of this landfill will impose a high degree of financial strain on the fixed income of senior citizens.

I believe that the closure of this landfill will result in a large amount of debris being scattered at will throughout the county, along highways, on private property where it has not been approved, and will become a huge problem over time etc.

This is not a good situation and could be easily remedied if the landfill were to remain open with current operating procedures.

Response

The closure permit and draft permit addresses only the post-closure management of the closed municipal waste disposal cell and does not affect the ongoing operation of the Chester Class IV landfill to continue to receive the type of waste for which it is currently permitted. The review of the closure application demonstrates the closed landfill will be managed in compliance with the Rules and will therefore protect the environment and public health.

No change to the current operation of the Chester Class IV landfill is anticipated. The current operation to receive construction demolition waste, green waste, dead animals, and tires will continue.

Determination

No change is required to the draft closure permit. The closure permit was approved and issued on August 11, 2005. The closure permit for the closed Class II disposal cell was issued without change.